

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively  
Consolidated SIPA Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff,

Plaintiff,

v.

JUDD ROBBINS,

Defendant.

Adv. Pro. No. 10-04503 (CGM)

**STIPULATION AND ORDER FOR VOLUNTARY  
DISMISSAL OF ADVERSARY PROCEEDING WITH PREJUDICE**

Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the substantively consolidated estate of Bernard L. Madoff individually, by and through his counsel, Baker & Hostetler LLP, and Judd Robbins (“Defendant”) by and through his counsel, Bruce A. Anderson (collectively, the “Parties”), hereby stipulate and agree to the following:

1. On November 30, 2010, the Trustee filed and served the Complaint against the Defendant.

2. On August 13, 2015, Defendant served an answer to the Complaint.

3. On July 15, 2021, Defendant filed a bankruptcy petition for relief under chapter 7 of the Bankruptcy Code in the Idaho Bankruptcy Court, Case No. 21-20284-NGH (the “Bankruptcy Proceeding”).

4. On or about August 9, 2021, the Trustee filed a claim in the Bankruptcy Proceeding for the amount sought in this litigation (the “Trustee’s Claim”).

5. On October 28, 2021, the Trustee filed an objection to the Defendant’s claim of exemptions in the Bankruptcy Proceeding.

6. Pursuant to the Settlement Procedures Order, entered by this Court on November 12, 2010 [ECF No. 3181], the parties entered into a Settlement Agreement, dated July 14, 2022 (the “Settlement Agreement”) resolving the above-captioned adversary proceeding and the objection to claim of exemptions in the Bankruptcy Proceeding.

7. On July 2, 2022, the Idaho Bankruptcy Court entered an order granting relief from the automatic stay so that the Parties could enter into the Settlement Agreement [ECF No. 89].

8. In accordance with Federal Rule of Bankruptcy Procedure 7041(a)(1)(ii), and Federal Rule of Civil Procedure 41(a)(1), the Parties hereby stipulate to a dismissal with prejudice of the Trustee’s claims against Defendant in the above-captioned adversary proceeding, and dismissal of the adversary proceeding.

9. The provisions of this Stipulation shall be binding upon and shall inure to the benefit of the Parties and their respective successors and assigns and upon all creditors and parties of interest.

10. This Stipulation may be signed by the Parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original.

Dated: August 29, 2022  
New York, New York

**BAKER & HOSTETLER LLP**

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*Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff*      *Attorney for Defendant*

**SO ORDERED.**

**Dated: August 30, 2022**  
**Poughkeepsie, New York**



/s/ Cecelia G. Morris

**Hon. Cecelia G. Morris**  
**U.S. Bankruptcy Judge**